

**CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input checked="" type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 07/17/2013	NEED RESPONSE BY: 07/23/2013
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Mendocino County	
3. PHONE NO.:	7. SUBJECT: Withdrawal Counting as income.	
4. REGULATION CITE(S): 63-501.11, 63-502.14, 63-102(L)	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s).	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

A client has a brokerage account through an investment firm. \$150000 of the value of the account is comprised of Mutual Funds. \$50000 of the value is identified as "cash, money funds, and bank deposits". The client withdraws \$11,000 from this account every 6 months to support his needs. Would this withdrawal be considered income?

10. REQUESTOR'S PROPOSED ANSWER:

Conversion or liquidation of a liquid resource, or brokerage account in this circumstance, from one form of liquid resource to another is not considered income. When the \$11,000 is held in the brokerage account it is a liquid resource. When that amount is withdrawn it is cash on hand, which is also a liquid resource. A withdrawal from a bank account is not identified as income in the CalFresh Regulations (63-502.14). The money from this withdrawal should be considered a resource, and as the households income is below the 130% FPL limit, it should be exempt from consideration in the CalFresh Program.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Mutual fund distributions are not specifically excluded as income in 63-502.2 and therefore, should be counted as income in the month received.

FOR CDSS USE

DATE RECEIVED: 7/23/13	DATE RESPONDED TO COUNTY/ALJ: 8/14/13 JN
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